

1 BRIAN K. TERRY, ESQ.
2 Nevada Bar No. 3171
bkt@thorndal.com
3 KENNETH R. LUND, ESQ.
4 Nevada Bar No. 10133
krl@thorndal.com
5 THORNDAL, ARMSTRONG, DELK,
6 BALKENBUSH & EISINGER
7 1100 Bridger Avenue
8 Las Vegas, Nevada 89101
TEL: (702) 366-0622
FAX: (702) 366-0327
9 Attorneys for Defendants,
IFRAH PLLC and ALAIN JEFF IFRAH
(incorrectly captioned ALAIN JEFFERY IFRAH)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

14 CHAD ELIE,

Plaintiff,

vs.

IFRAH PLLC, a Professional Limited Liability Company, ALAIN JEFFERY IFRAH a/k/a JEFF IFRAH, individually, DOE individuals I through XX, and ROE CORPORATIONS I through XX,

Defendants.

CASE NO. 2:13-CV-00888-JCM-VCF

**APPENDIX IN SUPPORT OF
DEFENDANTS' MOTION FOR
ATTORNEY FEES AND COSTS**

22 | // /

23 | // / //

∠4

25 | Page

27 | Page

28 |



TABLE OF CONTENTS

Affidavit of Brian K. Terry, Esq.....	A
Affidavit of Kenneth R. Lund, Esq.....	B
Invoice No. 114215 dated August 26, 2013.....	C
Invoice No. 114546 dated September 23, 2013	D
Invoice No. 116139 dated January 23, 2014	E

DATED this 24th day of February, 2014

THORNDAL, ARMSTRONG, DELK,
BALKENBUSH & EISINGER

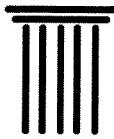
s/ Kenneth R. Lund
BRIAN K. TERRY, ESQ.
Nevada Bar No. 3171
KENNETH R. LUND, ESQ.
Nevada Bar No. 10133
1100 Bridger Avenue
Las Vegas, Nevada 89101
Attorneys for Defendants,
IFRAH PLLC and ALAIN JEFF
IFRAH (incorrectly captioned ALAIN
JEFFERY IFRAH)

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5 , I hereby certify that I am an employee of the law firm of THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER, a Professional Corporation, and that on this 24th day of February, 2014, I duly deposited for mailing at Las Vegas, Nevada, a true and correct copy of the above and foregoing APPENDIX IN SUPPORT OF DEFENDANTS' MOTION FOR ATTORNEY FEES AND COSTS, postage prepaid, addressed to:

NAME	TEL., FAX NO. & E-MAIL	PARTY REPRESENTING
Sigal Chattah, Esq. LAW OFFICES OF SIGAL CHATTAH 5875 South Rainbow Blvd., #204 Las Vegas, Nevada 89118	Tel.: (702) 360-6200 Fax: (702) 643-6292 E-Mail: chattahlaw@gmail.com	Plaintiff

s/ Kenneth R. Lund
Employee of THORNDAL, ARMSTRONG, DELK,
BALKENBUSH & EISINGER



LAW OFFICES
THORNDAL ARMSTRONG
DELK BALKENBUSH & EISINGER
A PROFESSIONAL CORPORATION
www.thorndal.com

EXHIBIT A

1 BRIAN K. TERRY, ESQ.
2 Nevada Bar No. 3171
bkt@thorndal.com
3 KENNETH R. LUND, ESQ.
4 Nevada Bar No. 10133
krl@thorndal.com
5 THORNDAL, ARMSTRONG, DELK,
6 BALKENBUSH & EISINGER
7 1100 Bridger Avenue
8 Las Vegas, Nevada 89101
9 TEL: (702) 366-0622
FAX: (702) 366-0327
10 Attorneys for Defendants,
IFRAH PLLC and ALAIN JEFF IFRAH
(incorrectly captioned ALAIN JEFFERY IFRAH)

11
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 CHAD ELIE,
15 Plaintiff,
16 vs.

17 IFRAH PLLC, a Professional Limited Liability
18 Company, ALAIN JEFFERY IFRAH a/k/a JEFF
19 IFRAH, individually, DOE individuals I through
XX, and ROE CORPORATIONS I through XX,

20
21 Defendants.

CASE NO. 2:13-cv-00888-JCM-VCF

22
23 **AFFIDAVIT OF BRIAN K.**
TERRY, ESQ.

24 STATE OF NEVADA)
25 (ss:
26 COUNTY OF CLARK)

27 I, BRIAN K. TERRY, ESQ., do hereby swear under penalty of perjury that the
28 following assertions are true to the best of my knowledge and belief:

1. I am an attorney licensed to practice law in the United States District Court in
the District of Nevada and in the courts of the State of Nevada since 1987, and offer the

1 following statements in support of the Motion For Attorney Fees brought by Defendants
 2 IFRAH PLLC and ALAIN JEFF IFRAH a/k/a JEFF IFRAH (incorrectly named ALAIN JEFFERY
 3 IFRAH in the dismissed lawsuit) against Plaintiff CHAD ELIE in the above-captioned matter.
 4

5 2. I am fully familiar with the facts of this case and the attorney fees incurred in
 6 the defense of Defendants that were charged by Thorndal, Armstrong, Delk, Balkenbush &
 7 Eisinger (“Thorndal Armstrong”).
 8

9 3. I am the lead attorney for Defendants in this matter. I have reviewed the
 10 itemization and documentation of the fees and costs claimed by Thorndal Armstrong, which
 11 are attached to Defendants’ Motion For Attorney Fees and Costs and Bill of Costs, and can
 12 attest that the fees sought, which amount to \$37,068.50, and costs, which amount to \$849.40
 13 (\$424.70 in taxable costs and \$424.70 in non-taxable costs), were actually and necessarily
 14 incurred and reasonable under the circumstances of this lawsuit.
 15

16 4. I adopt and incorporate by reference herein, the points and authorities in
 17 support of Defendants’ Motion for Attorney Fees, as if fully stated herein. They are true to
 18 the best of my knowledge and belief.
 19

20 5. I am a shareholder at Thorndal, Armstrong, Delk, Balkenbush & Eisinger, and
 21 have served as lead counsel for Defendants and supervised all work performed on this
 22 matter.
 23

24 6. I have tried numerous high-value professional malpractice cases as well as
 25 other liability and commercial matters.
 26

27 7. Based upon my dealings with other attorneys, my years of practice, my 25-
 28 years of trial experience in applicable area of law, and the value of cases I handle, I am aware

1 that the rate of \$170 per hour I am billing in this case is not only very reasonable, it is far
2 below what would typically charged for the type of work performed for similar litigation.
3

4 8. I supervised the work of associates Kenneth R. Lund, Esq.; Brandon R. Price,
5 Esq.; Meghan M. Goodwin, Esq.; and law clerk Matthew Winters and to the best of my
6 knowledge and belief, the work they performed matches their billings and generated the
7 work-product set forth in the invoices.
8

9 9. The associate billing rate of \$155 per hour is not only very reasonable, it is far
10 below what would typically charged for the type of work performed for similar litigation,
11 particularly for senior associate Kenneth R. Lund, Esq., the senior associate who performed
12 the majority of work in this matter.
13

14 10. I billed 33.7 hours for relevant work in this matter. Mr. Lund billed 184.6
15 hours of work on this matter. Mr. Price performed 13.9 hours of work on this matter. Ms.
16 Goodwin provided 3.8 hours of work on this matter. Mr. Winters provided 1.4 hours of
17 work at the law clerk rate of \$80 per hour.
18

19 11. This case required substantial document review and review of the pleadings
20 and papers in other cases throughout the United States. Our client provided abundant
21 materials requiring careful review.
22

23 12. This matter required research into numerous areas of law, many in cutting-
24 edge fields, including internet gaming law, banking regulation, internet marketing, federal
25 trade regulation, legal malpractice, contracts, and white collar crime. Although the basis for
26 dismissing Plaintiff's groundless lawsuit was straightforward, undertaking reasonable due
27
28

1 diligence on the underlying facts of the case required substantial legal research and
2 investigation.

3
4 13. Because of the research and investigation involved, the 237.4 hours incurred
5 in this case were reasonable given the complexity of the underlying facts and law.

6
7 14. The nature of this case required it be assigned to experienced and competent
8 defense counsel. The alleged recovery sought by Plaintiff was substantial and, upon
9 information and belief, exceeded \$4 Million. Due to the facts and circumstances of the
10 underlying cases and alleged transactions, this case required not only a background in legal
11 malpractice representation, but many other areas of law as well. I and the other employees at
12 Thorndal Armstrong, when representing Defendants in this matter, are long-term,
13 experienced Nevada litigators who have the quality and experience, professional standing
14 and skill necessary to provide this kind of representation.

15 /// ///
16

17 /// ///
18

19 /// ///
20

21 /// ///
22

23 /// ///
24

25 /// ///
26

27 /// ///
28

1 15. This Honorable Court found in favor of the arguments of Defendants and
2 granted a dismissal on this matter.
3

4 16. This request for attorney fees complies with the factors enunciated in *Brunzell*
5 *v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969) and Local Rule 54-16.

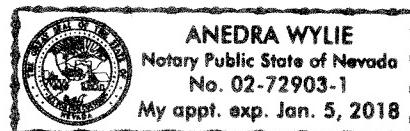
6 FURTHER YOUR AFFIANT SAYETH NAUGHT.

7 DATED this 29th day of February, 2014.

8
9
10 BRIAN K. TERRY

11 SUBSCRIBED AND SWORN to before me

12 this 24th day of February, 2014.



NOTARY PUBLIC in and for

Clark County, Nevada





LAW OFFICES
THORNDAL ARMSTRONG
DELK BALKENBUSH & EISINGER
A PROFESSIONAL CORPORATION
www.thorndal.com

EXHIBIT B

1 BRIAN K. TERRY, ESQ.
2 Nevada Bar No. 3171
bkt@thorndal.com
3 KENNETH R. LUND, ESQ.
4 Nevada Bar No. 10133
krl@thorndal.com
5 THORNDAL, ARMSTRONG, DELK,
6 BALKENBUSH & EISINGER
7 1100 Bridger Avenue
8 Las Vegas, Nevada 89101
TEL: (702) 366-0622
FAX: (702) 366-0327
9 Attorneys for Defendants,
IFRAH PLLC and ALAIN JEFF IFRAH
10 (incorrectly captioned ALAIN JEFFERY IFRAH)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

14 CHAD ELIE,

Plaintiff,
vs.

17 IFRAH PLLC, a Professional Limited Liability
18 Company, ALAIN JEFFERY IFRAH a/k/a JEFF
19 IFRAH, individually, DOE individuals I through
XX, and ROE CORPORATIONS I through XX,

21 Defendants.

CASE NO. 2:13-cv-00888-JCM-VCF

**AFFIDAVIT OF KENNETH R.
LUND, ESO.**

22 STATE OF NEVADA)
23 COUNTY OF CLARK) (ss:

25 I, KENNETH R. LUND, ESQ., do hereby swear under penalty of perjury that the
26 following assertions are true to the best of my knowledge and belief:

27 1. I am an attorney licensed to practice law in the United States District Court in
28 the District of Nevada since 2008 and in the courts of the State of Nevada since 2006, and



1 offer the following statements in support of the Motion For Attorney Fees brought by
2 Defendants IFRAH PLLC and ALAIN JEFF IFRAH a/k/a JEFF IFRAH (incorrectly named
3 ALAIN JEFFERY IFRAH in the dismissed lawsuit) against Plaintiff CHAD ELIE in the above-
4 captioned matter.

5
6 2. I am fully familiar with the facts of this case and the attorney fees and costs
7 incurred in the defense of Defendants that were charged by Thorndal, Armstrong, Delk,
8 Balkenbush & Eisinger ("Thorndal Armstrong").

9
10 3. I was asked by lead attorney Brian K. Terry, Esq. to serve as the lead associate
11 for Defendants in this matter. I have reviewed the itemization and documentation of the
12 fees and costs claimed by Thorndal Armstrong, which are attached to Defendants' Motion
13 For Attorney Fees and Bill of Costs, and can attest that the fees sought, which amount to
14 \$37,068.50, and costs, which amount to \$849.40, were actually and necessarily incurred and
15 reasonable under the circumstances of this lawsuit.

16
17 4. I adopt and incorporate by reference herein, the points and authorities in
18 support of Defendants' Motion for Attorney Fees, as if fully stated herein. They are true to
19 the best of my knowledge and belief.

20
21 5. I am a senior associate at Thorndal, Armstrong, Delk, Balkenbush & Eisinger,
22 and conducted the majority of investigation, research, document review, and analysis
23 required by this case. Under Brian K. Terry's supervision, I drafted the motion to dismiss
24 and the reply in support of the motion.

25
26 6. I performed 184.6 hours on this matter for which Defendants seek recovery in
27 this lawsuit.

1 7. Upon information and belief, my hourly rate of \$155 per hour is reasonable
 2 when considering my applicable qualifications, education, and experience. I have been an
 3 associate at Thorndal Armstrong for five-and-a-half years (after completing a two-year
 4 clerkship with a trial judge and law school at the S.J. Quinney College of Law at the
 5 University of Utah). Like lead counsel Brian K. Terry, I have received an AV® Preeminent
 6 rating from Martindale Hubbell's peer review program.
 7

8 8. Given the seven-figure recovery sought by Plaintiff and the complex areas of
 9 law relevant to the underlying facts and legal proceedings, including internet gaming, banking
 10 regulation, internet marketing, federal trade regulation, legal malpractice, contracts, and white
 11 collar crime, it is my understanding from my familiarity with associate practitioners in those
 12 fields that my rates are below what would typically be charged for the type of work
 13 performed for similar litigation.
 14

15 9. Likewise, as lead associate, I coordinated research assignments with associates
 16 Meghan M. Goodwin, Esq.; Brandon R. Price, Esq.; and law clerk Matthew Winters. Mr.
 17 Price performed 13.9 hours of work on this matter at the associate rate of \$155 per hour.
 18 Ms. Goodwin likewise provided 3.8 hours of work on this matter at the associate rate. Mr.
 19 Winters provided 1.4 hours of work at the law clerk rate of \$80 per hour. I know they
 20 actually performed this work because I received and reviewed their work product. Their
 21 hourly rates are likewise reasonable or below what would typically be charged for the type of
 22 work performed for similar litigation.
 23

1 10. This case required substantial document review and review of the pleadings
2 and papers in other cases throughout the United States. Additionally, our client provided
3 abundant materials requiring careful review and we found substantial additional materials
4 from PACER, the internet, and other sources.

5 11. This matter required research into numerous areas of law, many in dynamic,
6 cutting-edge fields. Although the basis for dismissing Plaintiff's groundless lawsuit was
7 straightforward, undertaking reasonable due diligence on the underlying facts of the case
8 required substantial legal research and investigation.

9 12. Because of the research and investigation involved, the 237.4 hours incurred
10 in this case by Mr. Terry, myself, and the other associates was reasonable given the
11 complexity of the underlying facts and law.

12 13. The \$3.50 filing fee dated May 22, 2013 found on Page 58 of Exhibit C to
13 Defendants' motion for attorney fees in the Eighth Judicial District Court for filing the
14 notice of removal is taxable under Local Rule 54-2.

15 14. The \$400.00 filing fee dated May 24, 2013 found on Page 58 of Exhibit C to
16 Defendants' motion for attorney fees in the Eighth Judicial District Court for removal to
17 this Court is taxable under Local Rule 54-2.

18 15. Defendants made copies of 51 pages of exhibits for its reply in support of its
19 motion to dismiss, 110 pages of exhibits for their motion to dismiss, and 50 pages of
20 exhibits attached to their petition for removal, each at a rate of \$.10 per page for a total of
21 \$21.20. This copying expense is taxable under Local Rule 54-6.
22
23
24
25
26
27
28

1 16. The remaining photocopy expenses of \$364.80 is non-taxable, but is
2 reasonable given the volume of documents necessary to review in this case and should be
3 recovered under Local Rule 54-16(b)(2).

5 17. Likewise, because the underlying subject matter in this case involved federal
6 cases in Utah, New York, and Florida, among other places, counsel was forced to incur at
7 least \$59.90 in PACER fees. Although this amount is non-taxable, it is perfectly reasonable
8 given the circumstances and should be recovered under Local Rule 54-16(b)(2).

10 18. As of the moment of executing this affidavit, I have performed an additional
11 30.4 hours of work which has not yet been billed on this matter at a rate of \$155 per hour,
12 for a total additional amount of \$4,712.00. This work includes reviewing this Court's order,
13 reviewing fees and costs in this matter, reviewing billing records for privileged material,
14 preparing Defendants' Motion for Attorney Fees and its accompanying exhibits, preparing a
15 bill of costs, and other work on this case. There will be additional billing on this case by
16 myself, Brian K. Terry, and possibly others, including time spent reviewing Plaintiff's
17 opposition and preparing a reply. Therefore, we intend to supplement the amount sought in
18 Defendants' reply brief.

19 19. Counsel's efforts in this case led to a good result. This Honorable Court found
20 in favor of the arguments of Defendants and granted a dismissal on this matter on February
21 10, 2014.

22 /// ///

23 /// ///

24 /// ///

20. This request for attorney fees complies with the factors enunciated in *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969) and Local Rule 54-16.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 29th day of February, 2014.



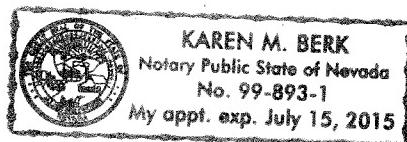
KENNETH R. LUND

SUBSCRIBED AND SWORN to before me

this 24 day of February, 2014.

NOTARY PUBLIC in and for

Clark County, Nevada





LAW OFFICES
THORNDAL ARMSTRONG
DELK BALKENBUSH & EISINGER
A PROFESSIONAL CORPORATION
www.thorndal.com

EXHIBIT C

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER
P.O. Drawer 2070
Las Vegas, NV 89125-2070
IRS #88-0111721 (702) 366-0622

08/26/13

Louis A. Peraggine
Zurich American Ins. Co.
P.O. Box 968041
Schaumburg, IL 60196-8041

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited
Liability Company & Alain Jeffery Ifrah
aka Jeff Ifrah, individually adv.
Chad Elie
CLAIM NO.: 9410414289
Policy No.: LPL 9206085 01
Term: 10/27/12 to 10/27/13
Court Case No.: A-13-679951-C, Dept. XVI

DUE AND PAYABLE UPON RECEIPT

	Emp	Services Performed	Hours	Amount
05/03/13	BKT	L110 A106 - Comprehensive e-mail exchange with client [REDACTED]	[REDACTED]	
05/03/13	BKT	L110 A106 - Extended telephone call with Jeff Ifrah re: [REDACTED]	0.3	51.00
05/03/13	BKT	L110 A108 - E-mail to Louis Paraggine re: [REDACTED]	0.6	102.00
05/05/13	BKT	L110 A104 - Review memorandum from Jeff Ifrah [REDACTED]	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		[REDACTED]		
05/05/13	BKT	L110 A104 - Review e-mail from client, Jeff Ifrah, [REDACTED]	0.1	17.00
05/05/13	BKT	L110 A104 - Review e-mail received from Jeff Ifrah [REDACTED]	0.3	51.00
05/05/13	BKT	L210 A104 - Review complaint filed by Sigal Chattah and summons issued against Ifrah. [REDACTED]	0.2	34.00
05/05/13	BKT	L110 A104 - Review e-mail from client, Jeff Ifrah, [REDACTED]	0.4	68.00
05/05/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
05/05/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
05/05/13	BKT	L110 A104 - Review e-mail received from Jeff Ifrah [REDACTED]	0.1	17.00
05/05/13	BKT	L110 A104 - Review e-mail		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		from Jeff Ifrah re: [REDACTED]		
05/05/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
05/05/13	BKT	L110 A104 - Review additional e-mail from Jeff Ifrah concerning [REDACTED]	0.1	17.00
05/05/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
05/05/13	BKT	L210 A104 - Review e-mail and complete pleading from Southern District of New York concerning [REDACTED]	0.1	17.00
05/05/13	BKT	L210 A104 - Review applicable policy received from adjuster, declaration page, etc. [REDACTED]	0.4	68.00
05/06/13	BKT	L110 A104 - E-mail to client [REDACTED] [REDACTED]	0.3	51.00
05/06/13	BKT	L110 A106 - Extended telephone call with client, Jeff Ifrah, [REDACTED] [REDACTED]	0.2	34.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/06/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah [REDACTED]	0.6	102.00
05/06/13	BKT	L110 A107 - Correspondence to plaintiff's counsel, Sigal Chattah, re: representation, re: 1.6 of Professional Rules of Conduct, etc. [REDACTED]	0.2	34.00
05/06/13	BKT	L110 A108 - Correspondence to Louis Paraggine, adjuster at Zurich, [REDACTED]	0.2	34.00
05/06/13	BKT	L110 A104 - Review e-mail from client [REDACTED]	0.1	17.00
05/06/13	BKT	L110 A106 - E-mail to client confirming [REDACTED]	0.1	17.00
05/07/13	BKT	L110 A106 - E-mail to client, Jeff Ifrah, re: [REDACTED]	0.1	17.00
05/07/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
05/07/13	BKT	L110 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
05/07/13	BKT	L110 A104 - Review e-mail from client re: [REDACTED]	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/07/13	BKT	L110 A106 - E-mail to [REDACTED] client re: [REDACTED]	0.1	17.00
05/08/13	BKT	L110 A107 - Telephone call to Sigal Chattah re: case status (left message). NO CHARGE.	0.1	17.00
05/08/13	BKT	L110 A107 - Extended telephone call with Sigal Chattah re: she is preparing amended complaint, will forward to the undersigned confirmation regarding Rules of Professional Conduct, etc.	0.0	N/C
05/10/13	KRL	L120 A104 - Initial review of materials provided by insured clients [REDACTED]	0.4	68.00
05/10/13	KRL	L120 A104 - Initial review of [REDACTED]	1.1	170.50
05/10/13	KRL	L120 A104 - Initial review of [REDACTED]	0.4	62.00
05/11/13	KRL	L120 A104 - Continued review of [REDACTED]	0.3	46.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		[REDACTED]		
05/11/13	KRL	L120 A102 - Began analysis of [REDACTED]	0.5	77.50
05/11/13	KRL	L210 A104 - Detailed review of [REDACTED]	0.4	62.00
05/13/13	BKT	L110 A104 - Review e-mail from client re: [REDACTED]	0.8	124.00
05/13/13	BKT	L110 A106 - E-mail to client re: [REDACTED]	0.1	17.00
05/13/13	BKT	L110 A107 - Correspondence to Sigal Chattah re: need confirmation of waiver and confirmation of extension.	0.1	17.00
05/13/13	BKT	L110 A104 - Review follow-up e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
05/13/13	BKT	L110 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
		[REDACTED]		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/13/13	BKT	L110 A108 - E-mail to Louis Paraggine re: [REDACTED]		
05/13/13	KRL	L210 A103 - Drafted federal notice of removal with requested federal information and description of case.	0.1	17.00
05/13/13	KRL	L210 A103 - Drafted state notice of removal.	1.3	201.50
05/13/13	KRL	L210 A103 - Drafted certificate as to interested parties for federal court.	0.2	31.00
05/13/13	KRL	L110 A104 - Background research on [REDACTED]	0.2	31.00
05/14/13	KRL	L120 A102 - Initial research on [REDACTED]	1.5	232.50
05/15/13	KRL	L210 A103 - Drafted [REDACTED] at issue in this case.	0.8	124.00
05/15/13	KRL	L120 A104 - Continued review of [REDACTED]	0.3	46.50
05/15/13	MJW	L120 A102 - Research regarding [REDACTED]	0.7	108.50
			0.5	40.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/16/13	BKT	L110 A104 - Review e-mail from Sigal Chattah re: confirmation that privilege is waived as to materials produced, will be provided amended complaint, etc.	0.1	17.00
05/16/13	BKT	L110 A107 - E-mail to Sigal Chattah re: issues with litigation, potential defamation if matters are privileged and need to be cautious of same.	0.1	17.00
05/16/13	BKT	L110 A106 - E-mail to client, Jeff Ifrah, re: [REDACTED]	0.1	17.00
05/16/13	KRL	L110 A103 - Began creation of timeline of [REDACTED]	0.1	17.00
05/17/13	BKT	L110 A104 - Review email from client, [REDACTED]	1.3	201.50
05/17/13	BKT	L210 A106 - Email to client [REDACTED]	0.1	17.00
05/17/13	BKT	L110 A104 - Email to Lewis Peraggine [REDACTED]	0.1	17.00
05/17/13	BKT	L110 A104 - Email to Lewis Peraggine [REDACTED]	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/17/13	KRL	L210 A104 - Detailed review of [REDACTED]	0.1	17.00
05/20/13	BKT	L210 A103 - Review and finalize [REDACTED]	2.3	356.50
05/20/13	BKT	L210 A103 - Review and finalize notice of removal [REDACTED]	0.1	17.00
05/20/13	BKT	L210 A103 - Review and finalize [REDACTED]	0.1	17.00
05/20/13	BKT	L210 A106 - E-mail to client [REDACTED]	0.2	34.00
05/20/13	BKT	L210 A104 - Review e-mail from Jeff Ifrah [REDACTED]	0.1	17.00
05/20/13	BKT	L210 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
05/20/13	KRL	L120 A104 - Began comparison of claims [REDACTED]	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		[REDACTED]		
05/21/13	BKT	L210 A103 - Review, revise and finalize all documents needing to be filed with Federal Court in order to effectuate removal.	0.8	124.00
05/21/13	KRL	L210 A104 - Reviewed federal district court order re: due dates for various events served on counsel.	0.2	34.00
05/21/13	KRL	L210 A104 - Reviewed consent to magistrate instructions served by federal court.	0.1	15.50
05/21/13	KRL	L210 A104 - Reviewed notice of case assignment from federal court.	0.1	15.50
05/21/13	KRL	L110 A103 - Continued creation of all-encompassing timeline of events [REDACTED]		
05/21/13	KRL	L110 A102 - Analysis of [REDACTED]	0.9	139.50
05/22/13	KRL	L210 A104 - Reviewed Plaintiff's Certificate of Interested Parties filed with federal court.	0.7	108.50
05/23/13	BKT	L210 A104 - Review Minute Order from Federal District Court requiring restatement regarding removal.	0.1	15.50
05/23/13	BKT	L210 A104 - Review notice from Federal Court on filing of removal	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/23/13	KRL	documents. L120 A104 - Began analysis of [REDACTED]	0.1	17.00
05/24/13	BKT	L110 A104 - Review e-mail from client, Jeff Ifrah, re: [REDACTED]	1.1	170.50
05/24/13	BKT	L110 A106 - E-mail to Jeff Ifrah [REDACTED]	0.1	17.00
05/24/13	KRL	L110 A104 - Initial review of [REDACTED]	0.1	17.00
05/24/13	KRL	L120 A102 - Analysis of [REDACTED]	1.8	279.00
05/24/13	KRL	L210 A107 - Began drafting [REDACTED]	0.4	62.00
05/24/13	KRL	L110 A104 - Reviewed [REDACTED]	0.5	77.50
05/24/13	KRL	L210 A107 - Began drafting [REDACTED]	0.8	124.00

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/24/13	KRL	L110 A104 - Reviewed [REDACTED]	0.3	46.50
05/24/13	KRL	L110 A104 - Third period of continued work [REDACTED]	0.5	77.50
05/24/13	KRL	L110 A104 - Began reviewing [REDACTED]	1.0	155.00
05/27/13	KRL	L210 A103 - Continued drafting [REDACTED]	1.8	279.00
05/27/13	KRL	L110 A104 - Continued reviewing [REDACTED]	2.2	341.00
05/27/13	KRL	L210 A103 - Continued [REDACTED]	2.2	341.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		drafting [REDACTED]		
05/27/13	KRL	L210 A103 - Continued drafting [REDACTED]	1.8	279.00
05/27/13	KRL	L110 A104 - Continued review [REDACTED]	0.3	46.50
05/28/13	BKT	L110 A104 - Review [REDACTED]	1.3	201.50
05/28/13	BKT	L210 A106 - Lengthy e-mail to Jeff Ifrah [REDACTED]	0.7	119.00
05/28/13	BKT	L210 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.3	51.00
05/28/13	BKT	L210 A106 - Lengthy e-mail to Jeff Ifrah [REDACTED]	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/28/13	BKT	L210 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.2	34.00
05/28/13	BKT	L210 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
05/28/13	BKT	L210 A104 - Review e-mail from Ken Lund to Jeff Ifrah re: [REDACTED]	0.1	17.00
05/28/13	BKT	L210 A108 - Comprehensive correspondence to adjuster, Louis Perraggine [REDACTED]	0.1	17.00
05/28/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.5	85.00
05/28/13	KRL	L120 A102 - Additional analysis of [REDACTED]	0.2	34.00
05/28/13	KRL	L210 A103 - Continued drafting [REDACTED]	0.9	139.50
05/28/13	KRL	L120 A104 - Strategized regarding approach to [REDACTED]	0.6	93.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		[REDACTED]		
05/28/13	KRL	L120 A106 - Correspondences from and to insured client Jeff Ifrah re: [REDACTED] .	0.5	77.50
05/28/13	KRL	L120 A106 - Telephone conference with insured client Jeff Ifrah re: [REDACTED]	0.1	15.50
05/28/13	KRL	L120 A106 - Additional correspondences with Jeff Ifrah re: [REDACTED]	0.1	15.50
05/28/13	KRL	L240 A103 - Began drafting motion to dismiss [REDACTED]	0.2	31.00
05/28/13	KRL	L110 A104 - Review of [REDACTED]	0.8	124.00
05/28/13	KRL	L110 A104 - Correspondences from and to Jeff Ifrah re: [REDACTED]	0.1	15.50
05/28/13	KRL	L110 A104 - Reviewed [REDACTED]	0.1	15.50
05/28/13	KRL	L110 A104 - Reviewed [REDACTED]	0.1	15.50
05/28/13	KRL	L110 A104 - Additional correspondences from insured client Jeff Ifrah [REDACTED]	0.3	46.50
		[REDACTED]	0.1	15.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/28/13	KRL	L110 A106 - Correspondences to Jeff Ifrah re: [REDACTED]	0.1	15.50
05/28/13	KRL	L110 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
05/28/13	KRL	L110 A104 - Continued review of [REDACTED]	0.8	124.00
05/29/13	KRL	L110 A106 - Reviewed [REDACTED]	0.1	15.50
05/29/13	KRL	L110 A104 - Reviewed [REDACTED]	0.3	46.50
05/29/13	KRL	L110 A106 - Reviewed [REDACTED]	0.2	31.00
05/29/13	KRL	L110 A104 - Review [REDACTED]	0.1	15.50
05/29/13	KRL	L110 A104 - Review [REDACTED]	0.2	31.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/29/13	KRL	L110 A104 - Initial receipt and review of [REDACTED]	0.1	15.50
05/29/13	KRL	L110 A104 - Reviewed [REDACTED]	0.1	15.50
05/29/13	KRL	L110 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
05/29/13	KRL	L110 A106 - Additional correspondences from Jeff Ifrah [REDACTED]	0.1	15.50
05/29/13	KRL	L110 A106 - Additional three correspondences [REDACTED]	0.1	15.50
05/29/13	KRL	L120 A103 - Continued drafting [REDACTED]	0.1	15.50
05/30/13	BKT	L110 A104 - Review correspondence from client re: [REDACTED]	1.3	201.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/30/13	BKT	L110 A106 - E-mail to client re: [REDACTED]	0.2	34.00
05/30/13	KRL	L240 A106 - Correspondence from and to Jeff Ifrah re: [REDACTED]	0.2	34.00
05/30/13	KRL	L240 A103 - Drafted customized standard of review section in support of motion to dismiss.	0.1	15.50
05/30/13	KRL	L240 A103 - Prepared exhibits in support of motion to dismiss.	1.5	232.50
05/30/13	KRL	L120 A106 - Correspondence from and to Jeff Ifrah re: [REDACTED]	0.3	46.50
05/30/13	KRL	L240 A103 - Drafted carefully worded introduction to motion to dismiss amended complaint.	0.1	15.50
05/30/13	KRL	L240 A103 - Continued drafting facts section in support of motion to dismiss.	1.4	217.00
05/30/13	KRL	L240 A102 - Outlined [REDACTED]	0.3	46.50
05/30/13	KRL	L240 A104 - Additional review of [REDACTED]	0.9	139.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		[REDACTED]		
		[REDACTED]		
05/30/13	KRL	L240 A104 - Additional review of [REDACTED] [REDACTED]	1.4	217.00
05/30/13	KRL	L240 A103 - Drafted argument in motion to dismiss that Plaintiff cannot pierce the corporate veil.	1.4	217.00
05/30/13	KRL	L240 A103 - Drafted facts section regarding Partner Weekly matter.	0.2	31.00
05/30/13	KRL	L430 A103 - Drafted discussion in facts section regarding selected alleged bad acts by Defendants.	0.9	139.50
05/31/13	BKT	L240 A104 - Review e-mail stream between BKT, Jeff Ifrah, client, and Ken Lund [REDACTED] [REDACTED]	1.3	201.50
05/31/13	BRP	L240 A102 - Analysis of [REDACTED] [REDACTED]	0.6	102.00
05/31/13	BRP	L240 A102 - Analysis of [REDACTED] [REDACTED]	0.4	62.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/31/13	BRP	L240 A102 - Analysis of [REDACTED]	1.2	186.00
05/31/13	BRP	L240 A102 - Analysis of [REDACTED]	0.7	108.50
05/31/13	BRP	L240 A102 - Analysis of [REDACTED]	0.6	93.00
05/31/13	BRP	L240 A102 - Analysis of [REDACTED]	0.6	93.00
05/31/13	BRP	L240 A102 - Analysis of [REDACTED]	0.4	62.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/31/13	BRP	L240 A102 - Analysis of [REDACTED]	0.6	93.00
05/31/13	BRP	L240 A102 - Analysis of [REDACTED]	0.5	77.50
05/31/13	BRP	L240 A102 - Analysis of [REDACTED]	0.4	62.00
05/31/13	BRP	L240 A102 - Analysis of [REDACTED]	0.4	62.00
05/31/13	BRP	L240 A102 - Analysis of [REDACTED]	0.6	93.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/31/13	BRP	Dismiss. L240 A102 - Analysis of [REDACTED]	0.5	77.50
05/31/13	BRP	L240 A102 - Analysis of [REDACTED] [REDACTED]	0.9	139.50
05/31/13	BRP	L240 A102 - Analysis of [REDACTED] [REDACTED]	0.5	77.50
05/31/13	BRP	L240 A102 - Analysis of [REDACTED] [REDACTED]	0.6	93.00
05/31/13	KRL	L240 A103 - Continued drafting facts section in support of motion to dismiss by discussing Plaintiff's guilty plea hearing.	0.9	139.50
05/31/13	KRL	L240 A103 - Continued	2.7	418.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		drafting facts section of motion to dismiss by discussing relevant information in superseding criminal information.	1.0	155.00
05/31/13	KRL	L240 A106 - Telephone conference with Jeff Ifrah re: [REDACTED]	0.1	15.50
05/31/13	KRL	L240 A103 - Correspondence from and to Jeff Ifrah re: [REDACTED]	0.1	15.50
05/31/13	KRL	L240 A106 - Correspondence from and to insured client re: [REDACTED]	0.1	15.50
05/31/13	KRL	L430 A103 - Drafted discussion of case law in argument that Plaintiff's first professional malpractice claim is unripe.	2.8	434.00
05/31/13	KRL	L240 A103 - Drafted argument in motion to dismiss applying law to facts why Plaintiff's first cause of malpractice is unripe.	1.0	155.00
05/31/13	KRL	L240 A103 - Drafted argument that Plaintiff's second claim for professional negligence with respect to his criminal prosecution is not actionable.	1.3	201.50
05/31/13	KRL	L240 A103 - Drafted arguments that Plaintiff's breach of contract and breach of covenant of good faith and fair dealing must		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

Emp	Services Performed	Hours	Amount
	fail.	0.9	139.50
05/31/13 KRL	L240 A103 - Drafted argument in motion to dismiss that Plaintiff's racketeering claim is not actionable.	1.4	217.00
05/31/13 KRL	L240 A103 - Drafted argument in motion to dismiss that Plaintiff cannot prove fraud.	0.5	77.50
05/31/13 KRL	L240 A103 - Drafted argument that Plaintiff is judicially estopped from representing to the court that he relied upon Defendants' representations.	2.1	325.50
05/31/13 KRL	L240 A103 - Drafted argument that cause of action for conspiracy was not actionable in motion to dismiss.	0.3	46.50
05/31/13 KRL	L240 A103 - Revised standard of review discussion in motion to dismiss.	0.2	31.00
05/31/13 KRL	L240 A103 - First revision of facts section of motion to dismiss.	1.3	201.50
05/31/13 KRL	L240 A103 - Revised and finalized argument that judicial estoppel bars Plaintiff's claims for relief.	0.3	46.50
05/31/13 KRL	L240 A103 - Revised argument that Plaintiff's second claim for professional negligence with respect to his criminal prosecution is not actionable.	0.3	46.50
05/31/13 KRL	L240 A103 - Revised and finalized motion to dismiss.	1.2	186.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
05/31/13	KRL	L240 A103 - Correspondences to insured clients re: [REDACTED]	0.1	15.50
05/31/13	KRL	L240 A103 - Additional revision and review of motion to dismiss to ensure it meets client's standards.	0.9	139.50
05/31/13	MMG	L240 A104 - Review and [REDACTED]	2.1	325.50
05/31/13	MMG	L240 A104 - Review [REDACTED]	0.4	62.00
05/31/13	MMG	L240 A102 - Conduct research into [REDACTED]	1.3	201.50
06/01/13	KRL	L240 A106 - Correspondence from and to insured client re: [REDACTED]	0.1	15.50
06/02/13	KRL	L240 A106 - Correspondences from Jeff Ifrah re: [REDACTED]	0.1	15.50
06/02/13	KRL	L240 A104 - Reviewed additional materials from [REDACTED]	0.6	93.00
06/02/13	KRL	L240 A106 - Additional [REDACTED]		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		correspondences from Jeff Ifrah re: [REDACTED]		
06/02/13	KRL	L240 A103 - Revised motion to dismiss per [REDACTED]	0.1	15.50
06/02/13	KRL	L240 A103 - Correspondence to insured client re: [REDACTED]	2.2	341.00
06/02/13	KRL	L110 A104 - Additional [REDACTED]	0.1	15.50
06/03/13	BKT	L240 A104 - Review draft of motion to dismiss amended complaint and make necessary changes thereto.	1.1	170.50
06/03/13	BKT	L210 A104 - Review comments from Jeff Ifrah [REDACTED]	0.7	119.00
06/03/13	BKT	L210 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
06/03/13	BKT	L240 A104 - Review exhibits to attach to motion which are contained in appendix to file with court.	0.1	17.00
06/03/13	BKT	L240 A104 - Review lengthy e-mail from Jeff Ifrah [REDACTED]	0.5	85.00
06/03/13	BKT	L240 A104 - Review e-mail	0.2	34.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		from Ken Lund to Jeff		
		Ifrah re: [REDACTED]		
		[REDACTED]		
			0.1	17.00
06/03/13	BKT	L240 A106 - E-mail to all parties re: [REDACTED]		
		[REDACTED]		
			0.1	17.00
06/03/13	BKT	L240 A104 - Review e-mail from Jeff Ifrah [REDACTED]		
		[REDACTED]		
			0.1	17.00
06/03/13	BKT	L240 A106 - E-mail to Jeff Ifrah re: [REDACTED]		
		[REDACTED]		
			0.1	17.00
06/03/13	BKT	L240 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]		
		[REDACTED]		
			0.1	17.00
06/03/13	BKT	L240 A104 - Review comments from Jeff Ifrah contained in e-mail regarding [REDACTED]		
		[REDACTED]		
			0.1	17.00
06/03/13	BKT	L240 A103 - Review and revise final draft of motion to dismiss, make necessary changes, reduce length of same, etc.	0.2	34.00
06/03/13	BKT	L240 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.9	153.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
06/03/13	BKT	L240 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
06/03/13	BKT	L240 A106 - E-mail to Jeff Ifrah with these [REDACTED]	0.1	17.00
06/03/13	BKT	L240 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
06/03/13	BKT	L240 A104 - Review e-mail from Jeff Ifrah with [REDACTED]	0.1	17.00
06/03/13	BKT	L240 A106 - E-mail to Jeff Ifrah with [REDACTED]	0.1	17.00
06/03/13	BKT	L240 A106 - E-mail to Jeff Ifrah confirming [REDACTED]	0.1	17.00
06/03/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
06/03/13	BKT	L110 A106 - E-mail to Jeff Ifrah, client, re: [REDACTED]	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
06/03/13	KRL	L240 A106 - Correspondences from insured client re: [REDACTED]	0.1	15.50
06/03/13	KRL	L240 A106 - Correspondence from insured client with [REDACTED]	0.1	15.50
06/03/13	KRL	L240 A106 - Correspondence from Jeff Ifrah with [REDACTED]	0.1	15.50
06/03/13	KRL	L240 A106 - Multiple correspondences with Jeff Ifrah re: [REDACTED]	0.1	15.50
06/03/13	KRL	L240 A106 - Telephone conference with insured client re: [REDACTED]	0.1	15.50
06/03/13	KRL	L240 A103 - Additional review and revision of motion to dismiss [REDACTED]	0.2	31.00
06/03/13	KRL	L240 A106 - Additional correspondences from Jeff Ifrah re: [REDACTED]	1.8	279.00
06/03/13	KRL	L240 A103 - Preparation of additional exhibits to attach to Motion to Dismiss.	0.1	15.50
06/03/13	KRL	L240 A103 - Additional revision after [REDACTED]	0.3	46.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		[REDACTED]		
		[REDACTED]		
06/03/13	KRL	L240 A104 - Telephone conference with Jeff Ifrah re: [REDACTED]	2.5	387.50
06/03/13	KRL	L240 A103 - Finalized motion to dismiss amended complaint.	0.2	31.00
06/03/13	KRL	L240 A104 - Drafted appendix in support of to motion to dismiss.	1.9	294.50
06/03/13	KRL	L240 A106 - Correspondence to insured client re: [REDACTED]	0.5	77.50
06/03/13	KRL	L240 A106 - Multiple correspondences from Jeff Ifrah re: [REDACTED]	0.1	15.50
06/03/13	KRL	L240 A106 - Correspondence to insured client re: [REDACTED]	0.1	15.50
06/05/13	BKT	L320 A104 - Review	0.1	15.50
06/05/13	KRL	L110 A104 - Review and investigation of [REDACTED]	1.3	221.00
06/05/13	KRL	L210 A103 - Drafted	1.8	279.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		[REDACTED]		
06/06/13	KRL	L250 A102 - Analysis of application of [REDACTED]	2.5	387.50
06/06/13	KRL	L120 A106 - Correspondence to client re: [REDACTED]	0.7	108.50
06/06/13	KRL	L210 A104 - Additional review and analysis of [REDACTED]	0.9	139.50
06/06/13	KRL	L210 A103 - Drafted argument in demand letter [REDACTED]	1.4	217.00
06/07/13	BKT	L120 A108 - Correspondence to Louis Paraggine, applicable adjuster, re: [REDACTED]	0.8	124.00
06/07/13	BKT	L110 A104 - Review e-mail chain between Jeff Ifrah and Ken Lund [REDACTED]	0.2	34.00
06/07/13	BKT	L110 A106 - E-mail to [REDACTED]	0.2	34.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		Jeff Ifrah [REDACTED]		
06/07/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
06/07/13	BKT	L110 A107 - E-mail confirmation of same to client [REDACTED]	0.1	17.00
06/07/13	BKT	L210 A103 - Review and finalize statement of removal required by federal court.	0.1	17.00
06/07/13	BKT	L110 A103 - Review draft letter [REDACTED]		
06/07/13	BKT	L110 A103 - Review extensive correspondence to Sigal Chattah concerning facts of case, reasons Rule 11 violation may be applicable, etc.	0.2	34.00
06/07/13	BKT	L210 A107 - Telephone call with Sigal Chattah re: her request for an extension of time, inquiry as to reasons why, etc.	0.5	85.00
06/07/13	BKT	L210 A104 - Review e-mail from same with proposed stipulation and order.	0.2	34.00
06/07/13	KRL	L210 A103 - Drafted arguments in demand letter that commission allegations are meritless and undisclosed legal memoranda arguments are meritless.	0.1	17.00
			0.9	139.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
06/07/13	KRL	L210 A103 - Refined argument that amended complaint was violation of New York protective order.	0.4	62.00
06/07/13	KRL	L250 A103 - Continued drafting letter to Plaintiff's counsel regarding her improper claims by refining introduction and conclusion to letter.	0.5	77.50
06/07/13	KRL	L102 A106 - Multiple correspondences with Jeff Ifrah re: [REDACTED] [REDACTED]	0.1	15.50
06/07/13	KRL	L120 A108 - (No Charge) Attempted multiple telephone calls [REDACTED] [REDACTED] [REDACTED]	0.1	N/C
06/07/13	KRL	L210 A103 - Drafted Statement Regarding Removed Action Pursuant to 28 USC 1441(a) and court order.	1.0	155.00
06/07/13	KRL	L210 A103 - Revised and finalized Statement Regarding Removed Action Pursuant to 28 USC 1441(a) and court order.	0.3	46.50
06/07/13	KRL	L250 A108 - Revised and finalized first draft of demand letter to Plaintiff's counsel.	0.9	139.50
06/07/13	KRL	L210 A103 - Drafted letter [REDACTED] [REDACTED]		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
06/07/13	MJW	L120 A102 - Research regarding [REDACTED]	0.3	46.50
06/10/13	BKT	L110 A104 - Review e-mail from client re: [REDACTED]	0.9	72.00
06/10/13	BKT	L110 A106 - E-mail to client, Jeff Ifrah, [REDACTED]	0.1	17.00
06/10/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah [REDACTED]	0.1	17.00
06/10/13	BKT	L110 A106 - E-mail to Jeff Ifrah with [REDACTED]	0.1	17.00
06/10/13	BKT	L210 A107 - E-mail to Sigal Chattah re: have permission for two week extension and need to finalize appropriate stipulation and order for court.	0.1	17.00
06/10/13	BKT	L120 A104 - Review e-mail from Sigal Chattah with request for two week extension from specific deadline given her client is still incarcerated.	0.1	17.00
06/10/13	BKT	L210 A107 - E-mail to Sigal Chattah re: 14 days after the 20th is the 4th and whether or not she needs additional time.	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
06/10/13	BKT	L210 A104 - Review follow-up e-mail from Sigal Chattah re: need two weeks following release of her client from prison.	0.1	17.00
06/10/13	BKT	L260 A107 - E-mail to Sigal Chattah re: please prepare substitution of counsel allowing defendants up to the 29th to file their reply brief and time allowed to plaintiff to respond to motion to dismiss.	0.1	17.00
06/10/13	BKT	L210 A104 - Review [REDACTED]	0.2	34.00
06/10/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
06/10/13	BKT	L110 A106 - [REDACTED]	0.1	17.00
06/10/13	BKT	L110 A103 - Review and revise second draft of lengthy correspondence to Sigal Chattah to comport with Rule 11 alleged violations and request that she dismiss the action.	1.2	204.00
06/10/13	BKT	L110 A103 - Review and revise letter [REDACTED]	0.2	34.00
06/10/13	BKT	L110 A106 - E-mail to [REDACTED]		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		Jeff Ifrah re: [REDACTED]		
06/10/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
06/10/13	BKT	L110 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
06/10/13	KRL	L240 A104 - Reviewed Plaintiff's proposed stipulation and order for extension.	0.1	17.00
06/11/13	BKT	L110 A104 - Review e-mail from Louis Paraggine,	0.1	15.50
06/11/13	BKT	L110 A108 - E-mail to Louis Paraggine re: [REDACTED]	0.1	17.00
06/11/13	BKT	L110 A103 - Review, revise and finalize correspondence to [REDACTED]	0.1	17.00
06/11/13	BKT	L110 A106 - E-mail to Jeff Ifrah [REDACTED]	0.1	17.00
06/11/13	BKT	L120 A108 - Lengthy e-mail to Louis Paraggine re: [REDACTED]	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

Emp	Services Performed	Hours	Amount
	[REDACTED]		
06/11/13 BKT	L210 A104 - Review e-mail from Sigal Chattah with new and revised stipulation and order continuing dates to file opposition to motion to dismiss.	0.1	17.00
06/11/13 BKT	L210 A107 - E-mail to Sigal Chattah re: approve same and she can sign electronically or I will forward to her original signature.	0.1	17.00
06/11/13 BKT	L210 A107 - E-mail to Sigal Chattah with copy of signed stipulation and order and so she can file with court.	0.1	17.00
06/11/13 BKT	L120 A104 - Review e-mail from Louis Paraggine re: [REDACTED]	0.1	17.00
06/12/13 BKT	L210 A104 - Review federal filing by Sigal Chattah of stipulation regarding continuance and deadlines for same.	0.1	17.00
06/14/13 BKT	L210 A104 - Review stipulation and order signed by Judge Mahan continuing deadlines for plaintiff to oppose motion to dismiss and reply brief.	0.1	17.00
06/14/13 BKT	L210 A103 - Review and revise status report to court regarding removal.	0.1	17.00
06/14/13 KRL	L210 A103 - Drafted		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		mandatory joint status report for review by opposing counsel and submission to court.	1.1	170.50
06/14/13	KRL	L210 A107 - Correspondence to Plaintiff's counsel Sigal Chattah re: proposed joint status report.	0.2	31.00
06/14/13	KRL	L110 A104 - Review of additional [REDACTED] [REDACTED]		
06/18/13	KRL	L210 A107 - Correspondence from Plaintiff's counsel Sigal Chattah re: approval of joint case conference report.	1.4	217.00
06/21/13	BKT	L210 A104 - Review joint status report filed with court concerning removal and notification from court concerning receipt of same.	0.1	15.50
06/21/13	BKT	L210 A106 - Correspondence to client, Jeff Ifrah, re: [REDACTED]	0.1	17.00
06/21/13	KRL	L210 A103 - Finalized joint status report after review by opposing counsel.	0.1	17.00
06/24/13	BKT	L210 A104 - Review e-mail from client re: [REDACTED]	0.4	62.00
06/24/13	BKT	L210 A106 - E-mail to client re: [REDACTED]	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
06/24/13	BKT	L210 A104 - Review e-mail re: [REDACTED]	0.1	17.00
06/24/13	BKT	L210 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
06/28/13	KRL	L120 A106 - Correspondence from insured client re: [REDACTED]	0.1	17.00
07/01/13	BKT	L110 A104 - Review e-mails from Jeff Ifrah, client, re: [REDACTED]	0.1	15.50
07/01/13	BKT	L110 A106 - E-mail to Jeff Ifrah confirming [REDACTED]	0.2	34.00
07/01/13	BKT	L210 A104 - Review follow-up e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/01/13	BKT	L210 A106 - E-mail to Jeff Ifrah [REDACTED]	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
07/01/13	BKT	L210 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/01/13	BKT	L210 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
07/01/13	KRL	L240 A104 - Multiple correspondences from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/01/13	KRL	L240 A101 - Research on [REDACTED]	0.1	15.50
07/01/13	KRL	L310 A102 - Analysis regarding viability of [REDACTED]	0.7	108.50
07/01/13	KRL	L240 A104 - Review of [REDACTED]	0.6	93.00
07/01/13	KRL	L310 A106 - Telephone conference with Jeff Ifrah re: [REDACTED]	0.5	77.50
07/02/13	KRL	L310 A102 - Additional analysis regarding [REDACTED]	0.3	46.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
07/03/13	BKT	L110 A104 - Review analysis from Ken Lund [REDACTED]	0.3	46.50
07/03/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/03/13	BKT	L110 A104 - Review response from Ken Lund to Jeff Ifrah re: [REDACTED]	0.1	17.00
07/03/13	BKT	L110 A106 - E-mail to Jeff Ifrah from BKT re: [REDACTED]	0.1	17.00
07/03/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/03/13	KRL	L310 A106 - Correspondence from and to Jeff Ifrah re: [REDACTED]	0.1	17.00
07/03/13	KRL	L310 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.3	46.50
07/03/13	KRL	L320 A102 - Analysis of [REDACTED]	0.1	15.50
07/03/13	KRL	L310 A106 - Correspondence to Jeff [REDACTED]	0.2	31.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

Emp	Services Performed	Hours	Amount
	Ifrah re: [REDACTED]		
07/04/13 KRL	L120 A106 - Correspondences from and to Jeff Ifrah re: [REDACTED]	0.1	15.50
07/05/13 BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/05/13 BKT	L110 A106 - E-mail to client re: [REDACTED]	0.1	17.00
07/07/13 KRL	L110 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/08/13 KRL	L110 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/09/13 KRL	L110 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/09/13 KRL	L110 A104 - Viewed [REDACTED]	0.1	15.50
07/09/13 KRL	L110 A106 - Correspondence to Jeff Ifrah re: [REDACTED]	0.2	31.00
07/09/13 KRL	L120 A106 - Multiple correspondences from and to Jeff Ifrah [REDACTED]	0.1	15.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
07/09/13	KRL	L120 A102 - Analysis regarding [REDACTED]	0.1	15.50
07/09/13	KRL	L110 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.4	62.00
07/09/13	KRL	L120 A106 - Correspondence to Jeff Ifrah re: [REDACTED]	0.1	15.50
07/09/13	KRL	L240 A106 - Correspondences from and to Jeff Ifrah re: [REDACTED]	0.2	31.00
07/10/13	BKT	L210 A104 - Review e-mail from client, Jeff Ifrah, re: [REDACTED]	0.1	15.50
07/10/13	BKT	L210 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
07/10/13	BKT	L210 A104 - Review e-mail from client re: [REDACTED]	0.1	17.00
07/10/13	BKT	L110 A104 - Review e-mail chain between Jeff Ifrah re: [REDACTED]	0.1	17.00
07/10/13	BKT	L110 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
07/10/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/10/13	BKT	L110 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
07/10/13	BKT	L110 A104 - Review e-mail and transcript of Elie's interview.	0.1	17.00
07/10/13	KRL	L110 A106 - Multiple correspondences to and from Jeff Ifrah re: [REDACTED]	0.2	34.00
07/10/13	KRL	L110 A106 - Reviewed comments from Jeff Ifrah	0.1	15.50
07/11/13	BKT	L110 A104 - Review e-mail from client [REDACTED]	0.1	15.50
07/11/13	KRL	L120 A104 - Strategy and analysis regarding approach to [REDACTED]	0.2	34.00
[REDACTED]	[REDACTED]	[REDACTED]	0.3	46.50
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

Emp	Services Performed	Hours	Amount
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

Emp	Services Performed	Hours	Amount
-----	--------------------	-------	--------

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]
07/12/13	BKT	L110 A106 - Review e-mail from Jeff Ifrah re: [REDACTED]	[REDACTED]	[REDACTED]
07/12/13	BKT	L110 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
		[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]
07/12/13	KRL	L110 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	[REDACTED]	[REDACTED]
07/12/13	KRL	L110 A106 - Reviewed comments from Jeff Ifrah on [REDACTED]	0.1	15.50
07/14/13	KRL	L120 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.9	139.50
07/14/13	KRL	L240 A103 -	0.1	15.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		Correspondences from and to Jeff Ifrah re:		
07/15/13	BKT	L110 A106 - Review e-mail from client, Jeff Ifrah, regarding [REDACTED]	0.1	15.50
07/15/13	BKT	L110 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
07/15/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/15/13	KRL	L110 A104 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/15/13	KRL	L110 A104 - Looked up [REDACTED]	0.1	15.50
07/15/13	KRL	L110 A106 - Correspondences from and to Jeff Ifrah re: [REDACTED]	0.2	31.00
07/15/13	KRL	L110 A106 - Teleconference with Jeff Ifrah re: [REDACTED]	0.1	15.50
07/15/13	KRL	L110 A104 - Obtained [REDACTED]	0.4	62.00
07/15/13	KRL	L110 A106 - Correspondence from Jeff	0.8	124.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		Ifrah re: [REDACTED]		
07/15/13	KRL	L110 A106 - Correspondence from Jeff	0.1	15.50
		Ifrah re: [REDACTED]		
07/15/13	KRL	L110 A104 - Reviewed [REDACTED]	0.1	15.50
		[REDACTED]		
07/15/13	KRL	L240 A106 - Multiple correspondences with Jeff	0.7	108.50
		Ifrah re: [REDACTED]		
07/15/13	KRL	L240 A104 - Initial receipt and review of 35-page opposition to motion to dismiss and 50-pages of exhibits	0.1	15.50
07/15/13	KRL	L240 A106 - Correspondence to Jeff	1.3	201.50
		Ifrah re: [REDACTED]		
07/15/13	KRL	L240 A104 - Review of yet more [REDACTED]	0.1	15.50
		[REDACTED]		
07/16/13	BKT	L240 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.3	46.50
		[REDACTED]		
07/16/13	BKT	L240 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
		[REDACTED]		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
07/16/13	BKT	L240 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/16/13	BKT	L240 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
07/16/13	BKT	L240 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/16/13	KRL	L240 A106 - Correspondences from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/16/13	KRL	L240 A104 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/16/13	KRL	L240 A106 - Numerous correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/16/13	KRL	L240 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/16/13	KRL	L240 A104 - Correspondence from Jeff Ifrah re: [REDACTED]	0.2	31.00
07/16/13	KRL	L240 A106 - Correspondences from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/16/13	KRL	L240 A106 - Correspondences from Jeff Ifrah re: [REDACTED]	0.1	15.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
07/17/13	BKT	Ifrah re: [REDACTED] [REDACTED] L240 A104 - Commence review of [REDACTED]	0.1	15.50
07/17/13	KRL	[REDACTED] L240 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.6	102.00
07/17/13	KRL	L240 A104 - Reviewed in detail [REDACTED]	0.1	15.50
07/17/13	KRL	[REDACTED] L240 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.9	139.50
07/17/13	KRL	L240 A104 - Correspondences to Jeff Ifrah re: [REDACTED]	0.1	15.50
07/17/13	KRL	L240 A104 - Initial receipt and review [REDACTED]	0.1	15.50
07/17/13	KRL	L240 A106 - Correspondences from Jeff Ifrah re: [REDACTED]	0.8	124.00
07/17/13	KRL	L240 A102 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/17/13	KRL	L240 A104 - Additional review of [REDACTED]	0.1	15.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
07/17/13	KRL	L240 A106 - Reviewed [REDACTED]	0.6	93.00
07/18/13	KRL	L240 A106 - Compared arguments [REDACTED]	0.3	46.50
07/18/13	KRL	L240 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.5	77.50
07/18/13	KRL	L240 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/18/13	KRL	L240 A106 - Correspondence to Jeff Ifrah re: [REDACTED]	0.1	15.50
07/18/13	KRL	L110 A104 - Initial review of [REDACTED]	0.1	15.50
07/18/13	KRL	L240 A103 - Outlined [REDACTED]	1.2	186.00
07/19/13	KRL	L240 A106 - Lengthy telephone conference with insured client Jeff Ifrah [REDACTED]	1.4	217.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
07/19/13	KRL	L240 A101 - Prepared for meeting with Jeff Ifrah [REDACTED]	2.2	341.00
07/19/13	KRL	L240 A106 - Correspondences from Jeff Ifrah re: [REDACTED]	1.0	155.00
07/19/13	KRL	L240 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/19/13	KRL	L240 A106 - Additional teleconference with Jeff Ifrah re: [REDACTED]	0.1	15.50
07/19/13	KRL	L240 A106 - Additional correspondences from and to Jeff Ifrah re: [REDACTED]	0.1	15.50
07/19/13	KRL	L240 A106 - Telephone conference from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/19/13	KRL	L240 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/19/13	KRL	L240 A106 - Correspondences with Jeff Ifrah re: [REDACTED]	0.1	15.50
07/19/13	KRL	L240 A106 - (No Charge) Lengthy voicemail from insured client Jeff Ifrah [REDACTED]	0.1	15.50
07/19/13	KRL	L240 A106 - [REDACTED]	0.1	N/C

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		Correspondence to insured client Jeff Ifrah re: [REDACTED]		
07/20/13	KRL	L110 A104 - Additional review of abundant materials [REDACTED]	0.1	15.50
07/20/13	KRL	L240 A103 - Began drafting reply in support on motion to dismiss. [REDACTED]	1.1	170.50
07/21/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.8	124.00
07/22/13	BKT	L110 A107 - (No Charge) Telephone call with Sigal Chattah re: need extension within which to prepare reply brief and reasons for same (left message). [REDACTED]	0.2	34.00
07/22/13	BKT	L110 A107 - Correspondence to Sigal Chattah re: need additional time on brief given death in family. [REDACTED]	0.0	N/C
07/22/13	BKT	L110 A107 - E-mail to Sigal Chattah concerning same and need response. [REDACTED]	0.1	17.00
07/22/13	BKT	L210 A104 - Review and revise stipulation and order to continue reply brief for Sigal Chattah's signature and filing with federal court. [REDACTED]	0.1	17.00
07/22/13	BKT	L110 A104 - Review e-mail from Sigal Chattah re: have consent to electronically sign for stipulation. [REDACTED]	0.1	17.00
07/22/13	BKT	L240 A106 - E-mail to [REDACTED]		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

Emp	Services Performed	Hours	Amount
	client re: [REDACTED]		
07/22/13 KRL	L240 A107 - Telephone conference with Plaintiff's counsel re: extension of time to file reply brief.	0.1	17.00
07/22/13 KRL	L240 A103 - Drafted stipulation and order to extend time to file reply brief.	0.1	15.50
07/22/13 KRL	L240 A107 - Correspondence to Plaintiff's counsel re: proposed stipulation and correspondence from her approving same.	0.6	93.00
07/22/13 KRL	L110 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/22/13 KRL	L240 A103 - Revised and finalized stipulation and order to extend time for reply.	0.2	31.00
07/22/13 KRL	L240 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.2	31.00
07/22/13 KRL	L240 A103 - Continued drafting introduction that sets framework for reply in support of motion to dismiss.	0.2	31.00
07/25/13 KRL	L240 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.9	139.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
07/25/13	KRL	L240 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/25/13	KRL	L240 A103 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/26/13	BKT	L110 A104 - Review materials from Jeff Ifrah concerning [REDACTED]	0.1	15.50
07/26/13	BKT	L210 A104 - Review stipulation and order allowing extension by federal court within which to file reply brief.	0.2	34.00
07/26/13	KRL	L240 A104 - Reviewed stipulation and order for extension signed by court.	0.1	17.00
07/29/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah to [REDACTED]	0.1	15.50
07/29/13	BKT	L110 A106 - Lengthy e-mail to Jeff Ifrah re: [REDACTED]	0.3	51.00
07/29/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.2	34.00
07/29/13	BKT	L110 A106 - Review e-mail from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/29/13	BKT	L110 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
07/29/13	KRL	L240 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	17.00
07/29/13	KRL	L240 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.2	31.00
07/29/13	KRL	L240 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	0.1	15.50
07/30/13	KRL	L240 A104 - Research and analysis of [REDACTED]	0.1	15.50
07/30/13	KRL	L240 A104 - Review of [REDACTED]	1.8	279.00
07/31/13	KRL	L240 A103 - Began drafting discussion that nothing in Plaintiff's opposition changes the fact that Plaintiff is judicially estopped from making his argument due to his guilty plea.	1.5	232.50
			1.6	248.00
Professional fees thru: 07/31/13			175.2	\$27,507.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

Emp	Hours	Rate	Amount
Brian K. Terry, Partner	32.50	170.00	5,525.00
Meghan M. Goodwin, Associate	3.80	155.00	589.00
Brandon R. Price, Associate	9.80	155.00	1,519.00
Kenneth R. Lund, Associate	127.50	155.00	19,762.50
Matthew J. Winters, Paralegal	1.40	80.00	112.00
Kenneth R. Lund, Associate	0.20	0.00	0.00

	Costs advanced	Amount
05/22/13	E112 - Mandatory Clark County Electronic Filing Fee re: Notice of Removal to Federal Court	3.50
05/24/13	E112 - Kenneth Lund, Esq. - Reimburse for Federal Court Filing Fee for Notice of Removal	400.00
05/28/13	E101 - Photocopy Charges (<u>1420 copies @ .10</u>)	142.00
07/18/13	E124 - Kenneth Lund - reimbursement for PACER electronic search for records	5.00
[REDACTED]	[REDACTED]	[REDACTED]
	Total advanced cost thru 07/31/13	\$764.00
	Total current fees and costs 07/31/13	\$28,271.50

Invoice no	Credits to account	Amount
09/20/13 114215	Payment received from Zurich American Insurance Company (chk# 3332386235)	27,446.27CR
09/20/13 114215	Write off fees for Zurich American's payment discount.	825.23CR
	Total payments received	\$28,271.50CR

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

08/26/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114215

Re: IFRAH PLLC, a Professional Limited

TOTAL BALANCE DUE THIS INVOICE: \$0.00
=====

NOTE: Please Include Our File No. and/or Invoice No. On Your
Payment.

MAKE CHECKS PAYABLE TO: THORNDAL, ARMSTRONG, DELK,
BALKENBUSH & EISINGER -- OR T.A.D.B.E.

WE NOW ACCEPT MAJOR CREDIT CARDS



LAW OFFICES
THORNDAL ARMSTRONG
DELK BALKENBUSH & EISINGER
A PROFESSIONAL CORPORATION
www.thorndal.com

EXHIBIT D

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER
P.O. Drawer 2070
Las Vegas, NV 89125-2070
IRS #88-0111721 (702) 366-0622

09/23/13

Louis A. Peraggine
Zurich American Ins. Co.
P.O. Box 968041
Schaumburg, IL 60196-8041

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited
Liability Company & Alain Jeffery Ifrah
aka Jeff Ifrah, individually adv.
Chad Elie
CLAIM NO.: 9410414289
Policy No.: LPL 9206085 01
Term: 10/27/12 to 10/27/13
Court Case No.: A-13-679951-C, Dept. XVI

DUE AND PAYABLE UPON RECEIPT

	Emp	Services Performed	Hours	Amount
08/01/13	KRL	L240 A104 - Reviewed [REDACTED]		
08/01/13	KRL	L240 A104 - Reviewed [REDACTED]	1.2	186.00
08/01/13	KRL	L240 A104 - Reviewed [REDACTED]	0.6	93.00
08/02/13	KRL	L240 A103 - Drafting [REDACTED]	0.7	108.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

09/23/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		argument that Plaintiff misinterprets hearing transcript.		
08/02/13	KRL	L240 A104 - Identified documents [REDACTED]	1.6	248.00
08/02/13	KRL	[REDACTED] L240 A104 - Review of [REDACTED]	0.9	139.50
08/02/13	KRL	[REDACTED] L240 A103 - Continued drafting introductory framework to reply in support of motion to dismiss.	2.7	418.50
08/02/13	KRL	L240 A103 - Continued drafting argument in reply in support of motion to dismiss that Plaintiff's claim that his plea hearing does not cover the acts at issue in this case is unmeritorious.	0.5	77.50
08/02/13	KRL	L240 A104 - Reviewed [REDACTED]	0.6	93.00
08/02/13	KRL	L240 A106 - Correspondence from and to Jeff Ifrah re: [REDACTED]	1.1	170.50
08/03/13	KRL	L240 A103 - Drafted [REDACTED]	0.1	15.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

09/23/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited

Emp	Services Performed	Hours	Amount
	argument regarding records that show that Chad Elie is not as reliant on counsel as he claims.	0.6	93.00
08/03/13 KRL	L240 A104 - Continued review of [REDACTED]	1.1	170.50
08/03/13 KRL	L240 A104 - Reviewed [REDACTED]	0.3	46.50
08/03/13 KRL	L240 A104 - Identifying [REDACTED]	0.9	139.50
08/03/13 KRL	L240 A104 - Research on [REDACTED]	0.2	31.00
08/03/13 KRL	L240 A104 - Reviewed [REDACTED]	2.2	341.00
08/03/13 KRL	L240 A106 - Correspondence to Jeff Ifrah re: [REDACTED]		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

09/23/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
08/03/13	KRL	L240 A104 - Identification of numerous specific [REDACTED]	0.1	15.50
08/04/13	KRL	L240 A106 - Correspondences from and to client Jeff Ifrah re: [REDACTED]	1.7	263.50
08/05/13	KRL	L240 A104 - Additional analysis and review of [REDACTED]	0.1	15.50
08/05/13	KRL	L240 A102 - Additional [REDACTED]	1.1	170.50
08/05/13	KRL	L240 A103 - Drafted [REDACTED]	1.3	201.50
08/05/13	KRL	L240 A103 - Continued drafting argument that Plaintiff misrepresents the scope of his allocution and plea agreement by discussing his admissions under oath to willingly operate an [REDACTED]	1.7	263.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

09/23/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
08/05/13	KRL	illegal gambling business. L240 A106 - Correspondences from and to insured client re: [REDACTED]	1.4	217.00
08/05/13	KRL	L240 A102 - Analysis regarding [REDACTED]	0.1	15.50
08/06/13	KRL	L240 A103 - Began drafting argument that Plaintiff has failed to [REDACTED]	0.7	108.50
08/06/13	KRL	[REDACTED] L240 A103 - Drafted argument that Plaintiff's Viable-Partner Weekly malpractice claim is unripe.	0.9	139.50
08/06/13	KRL	L240 A104 - Research on fact-specific cases on [REDACTED]	1.2	186.00
08/06/13	KRL	[REDACTED] L240 A103 - Continued drafting argument that Plaintiff's attacks on judicial estoppel arguments are unfounded.	1.2	186.00
08/06/13	KRL	L240 A103 - Drafted argument that Plaintiff's contention that he only pleaded guilty to bank fraud is a straw man.	0.7	108.50
08/06/13	KRL	L240 A104 - Reviewed numerous emails and documents [REDACTED]	0.6	93.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

09/23/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
08/06/13	KRL	L240 A103 - Drafted argument rebutting Plaintiff's claims for reasons why he was indicted.	1.4	217.00
08/06/13	KRL	L240 A103 - Drafted argument that [REDACTED]	0.4	62.00
08/06/13	KRL	L240 A103 - Drafted argument that Plaintiff admits Defendants consistently recommended that Plaintiff's obtain second opinions regarding legality of poker.	1.5	232.50
08/07/13	BRP	L240 A102 - Analysis of case law in Nevada and other jurisdictions [REDACTED]	1.0	155.00
08/07/13	BRP	to assist in preparing Reply in Support of Motion to Dismiss.	1.2	186.00
08/07/13	BRP	L240 A102 - Analysis of case law in Nevada and other jurisdictions regarding [REDACTED]		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

09/23/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

09/23/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		encouraged Plaintiff to illegally process poker are falsely represented and out-of-context.	1.3	201.50
08/07/13	KRL	L240 A103 - Drafted argument that Plaintiff neglected to include attachment which showed actual billing in attached emails.	0.9	139.50
08/07/13	KRL	L240 A104 - Additional review of [REDACTED]		
08/07/13	KRL	[REDACTED]	0.7	108.50
08/07/13	KRL	L240 A102 - Additional legal analysis of [REDACTED]		
08/07/13	KRL	[REDACTED]	1.3	201.50
08/07/13	KRL	L240 A102 - Analysis of applicability of [REDACTED]		
08/07/13	KRL	[REDACTED]	1.0	155.00
08/07/13	KRL	L240 A103 - Drafted argument that Plaintiff's claims are barred by the doctrine of in pari delicto.	1.3	201.50
08/07/13	KRL	L240 A102 - Analysis of applicability of collateral estoppel to Plaintiff arguments in opposition.	0.6	93.00
08/07/13	KRL	L240 A103 - Drafted argument that Plaintiff's		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

09/23/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited

Emp	Services Performed	Hours	Amount
	claims and arguments in opposition are barred by doctrine of collateral estoppel.		
08/07/13 KRL	L240 A103 - Drafted argument that Plaintiff's claims that but for Ifrah's acts he would have not be punished for bank fraud violates public policy.	1.4	217.00
08/07/13 KRL	L240 A103 - Detailed additional review of [REDACTED]	1.6	248.00
08/07/13 KRL	L240 A104 - Additional review of [REDACTED]	1.1	170.50
08/08/13 BKT	L210 A103 - Review and revise for finalizing reply brief in support of motion to dismiss, check appropriate citations, make necessary changes and provide to Associate, Ken Lund, for complete finalization.	0.6	93.00
08/08/13 BKT	L110 A104 - Review e-mail chain between Jeff Ifrah and Ken Lund [REDACTED]	0.8	136.00
08/08/13 BKT	L210 A106 - E-mail to Jeff Ifrah from BKT [REDACTED]	0.2	34.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

09/23/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
08/08/13	BKT	L210 A104 - Review e-mail from Jeff Ifrah concerning [REDACTED]	0.1	17.00
08/08/13	BKT	L210 A106 - E-mail to Jeff Ifrah re: [REDACTED]	0.1	17.00
08/08/13	KRL	L240 A103 - Continued drafting arguments regarding the error of Plaintiff's attached exhibits.	0.1	17.00
08/08/13	KRL	L240 A103 - Drafted argument that Plaintiff's claims fail as a matter of law.	0.9	139.50
08/08/13	KRL	L240 A103 - Drafted argument that Plaintiff misstates rules governing motions to dismiss and for summary judgment.	0.8	124.00
08/08/13	KRL	L240 A103 - Drafted argument that Plaintiff's exhibits are irrelevant to motion.	0.8	124.00
08/08/13	KRL	L240 A103 - Continued preparation and polishing of reply brief prior to sending to insured client for review.	0.5	77.50
08/08/13	KRL	L240 A103 - Correspondence to insured client re: review of	1.5	232.50

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

09/23/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
08/08/13	KRL	proposed reply brief. L240 A106 - Reviewed correspondence from insured client re: [REDACTED]	0.1	15.50
08/08/13	KRL	L240 A103 - Considered and implemented substantive changes to reply brief [REDACTED]	0.1	15.50
08/08/13	KRL	L240 A103 - Correspondence to insured client re: [REDACTED]	1.8	279.00
08/08/13	KRL	L240 A103 - Identified and attached exhibits to proposed reply brief.	0.1	15.50
08/08/13	KRL	L240 A103 - Multiple correspondences from and to insured client re: [REDACTED]	0.3	46.50
08/08/13	KRL	L240 A104 - Analysis of [REDACTED]	0.1	15.50
08/09/13	BKT	L210 A104 - Review e-mail from client, Jeff Ifrah, concerning [REDACTED]	0.4	62.00
08/09/13	BKT	L210 A104 - Review e-mail from Jeff Ifrah concerning [REDACTED]	0.1	17.00
08/09/13	BKT	L210 A106 - E-mail to [REDACTED]	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

09/23/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		Jeff Ifrah concerning [REDACTED]		
08/09/13	KRL	L240 A103 - Implemented additional changes to brief [REDACTED]	0.1	17.00
08/09/13	KRL	L240 A103 - Revised and finalized Reply in Support of Motion to Dismiss in preparation for filing of same.	1.4	217.00
08/09/13	KRL	L240 A104 - Reviewed notice from district court re: proof of filing and service of brief.	1.6	248.00
08/09/13	KRL	L240 A106 - Correspondence to insured client re: [REDACTED]	0.1	15.50
08/12/13	BKT	L240 A104 - Review final reply brief and all attached exhibits regarding motion to dismiss.	0.1	15.50
08/12/13	BKT	L120 A108 - Correspondence to Louis Peraggine, applicable adjuster, re: [REDACTED]	0.1	17.00
		[REDACTED]	0.2	34.00
		[REDACTED]		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

09/23/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited

Emp	Services Performed	Hours	Amount
08/13/13 KRL	L110 A106 - Correspondence from Jeff Ifrah re: [REDACTED]	[REDACTED]	[REDACTED]
08/15/13 KRL	L240 A108 - Telephone conference with district court re: courtesy copy requirements for Judge Mahan.	0.1	15.50
08/30/13 KRL	L110 A104 - Reviewed [REDACTED]	0.1	15.50
		0.4	62.00
Professional fees thru: 08/31/13		61.6	\$9,579.50

Emp	Hours	Rate	Amount
Brian K. Terry, Partner	2.10	170.00	357.00
Brandon R. Price, Associate	4.10	155.00	635.50
Kenneth R. Lund, Associate	55.40	155.00	8,587.00

Costs advanced	Amount
08/01/13 E101 - Photocopy Charges (<u>123 copies @ \$0.10</u>)	12.30
Total advanced cost thru 08/31/13	\$12.30
Total current fees and costs 08/31/13	\$9,591.80

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

09/23/13

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 114546

Re: IFRAH PLLC, a Professional Limited

	Invoice no	Credits to account	Amount
10/18/13	114546	Payment received from Zurich American Insurance Company (chk# 3332396057)	9,304.41CR
10/18/13	114546	Write off fees to cover Zurich American's payment discount.	287.39CR
		Total payments received	\$9,591.80CR
			=====
		TOTAL BALANCE DUE THIS INVOICE:	\$0.00
			=====

NOTE: Please Include Our File No. and/or Invoice No. On Your
Payment.

MAKE CHECKS PAYABLE TO: THORNDAL, ARMSTRONG, DELK,
BALKENBUSH & EISINGER -- OR T.A.D.B.E.

WE NOW ACCEPT MAJOR CREDIT CARDS



LAW OFFICES
THORNDAL ARMSTRONG
DELK BALKENBUSH & EISINGER
A PROFESSIONAL CORPORATION
www.thorndal.com

EXHIBIT E

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER
P.O. Drawer 2070
Las Vegas, NV 89125-2070
IRS #88-0111721 (702) 366-0622

01/23/14

Louis A. Peraggine
Zurich American Ins. Co.
P.O. Box 968041
Schaumburg, IL 60196-8041

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 116139

Re: IFRAH PLLC, a Professional Limited
Liability Company & Alain Jeffery Ifrah
aka Jeff Ifrah, individually adv.
Chad Elie
CLAIM NO.: 9410414289
Policy No.: LPL 9206085 01
Term: 10/27/12 to 10/27/13
Court Case No.: A-13-679951-C, Dept. XVI

DUE AND PAYABLE UPON RECEIPT

	Emp	Services Performed	Hours	Amount
10/02/13	BKT	L110 A106 - E-mail to client, Jeff Ifrah, re: [REDACTED]	[REDACTED]	
10/02/13	BKT	L110 A104 - Review response from Jeff Ifrah re: [REDACTED]	0.1	17.00
10/03/13	BKT	L110 A107 - Correspondence to Sigal Chattah re: request to stipulation to hold discovery in abeyance.	0.1	17.00
10/08/13	BKT	L110 A107 - Correspondence to Sigal Chattah, counsel for plaintiff, re: suggest holding 26(f)	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

01/23/14

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 116139

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		requirements and discovery issues in abeyance pending motion to dismiss and need to discuss same.	0.1	17.00
10/11/13	BKT	L110 A107 - Telephone call to Sigal Chattah re: need to address 26(f) issue and please contact to do so (left message). NO CHARGE.	0.1	N/C
10/11/13	BKT	L110 A107 - E-mail to Sigal Chattah re: need to address 26(f) issues and please call to discuss.	0.1	17.00
10/15/13	KRL	L110 A104 - Monitoring of [REDACTED]	0.2	31.00
10/16/13	BKT	L210 A104 - Review e-mail from plaintiff's counsel, Sigal Chattah, re: status of discovery.	0.1	17.00
10/16/13	BKT	L210 A103 - Review and revise proposed discovery scheduling order to be filed with court.	0.2	34.00
10/16/13	BKT	L210 A107 - E-mail to Sigal Chattah with approval of same with specific recommendations and changes and may sign on my behalf.	0.1	17.00
10/17/13	BKT	L210 A104 - Review electronic notation from federal district court concerning filing of 26(f) proposed discovery order.	0.1	17.00
10/17/13	BKT	L210 A104 - Review conformed copy of proposed discovery order filed with federal district court.	0.1	17.00

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

01/23/14

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 116139

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
10/17/13	KRL	L310 A104 - Reviewed proposed discovery scheduling order.	0.1	15.50
10/21/13	BKT	L210 A104 - Review order signed by Judge Cam Ferenbach concerning stay of discovery.	0.1	17.00
10/21/13	BKT	L210 A104 - Review notice from federal court of stay now in place.	0.1	17.00
10/21/13	BKT	L120 A108 - Comprehensive up-date and correspondence to applicable adjuster, Louis Peraggine re: [REDACTED] [REDACTED]	0.3	51.00
10/21/13	BKT	L120 A106 - Correspondence to Jeff Ifrah [REDACTED] [REDACTED]	0.1	17.00
10/21/13	KRL	L310 A104 - Reviewed discovery scheduling order entered by court.	0.1	15.50
10/23/13	KRL	L310 A102 - Analysis of [REDACTED] [REDACTED]	0.3	46.50
10/28/13	KRL	L310 A106 - Correspondence from and to Jeff Ifrah re: [REDACTED] [REDACTED]	0.1	15.50
11/07/13	BKT	L110 A104 - Review e-mail from Jeff Ifrah re: [REDACTED] [REDACTED]	0.1	17.00
11/07/13	BKT	L110 A107 - E-mail to Jeff Ifrah re: [REDACTED]		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

01/23/14

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 116139

Re: IFRAH PLLC, a Professional Limited

	Emp	Services Performed	Hours	Amount
		[REDACTED]		
11/07/13	KRL	L110 A104 - Reviewed [REDACTED]	0.1	17.00
		[REDACTED]		
11/11/13	KRL	L110 A104 - Reviewed [REDACTED]	0.1	15.50
		[REDACTED]		
11/11/13	KRL	L110 A106 - Correspondence from and to Jeff Ifrah re: [REDACTED]	0.2	31.00
		[REDACTED]		
11/12/13	KRL	L110 A106 - Correspondence from and to Jeff Ifrah re: [REDACTED]	0.1	15.50
		[REDACTED]		
12/04/13	KRL	L110 A104 - Reviewed [REDACTED]		
		[REDACTED]		
12/31/13	KRL	L110 A104 - Reviewed [REDACTED]	0.2	31.00
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

01/23/14

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
 Invoice No. 116139

Re: IFRAH PLLC, a Professional Limited

Emp	Services Performed	Hours	Amount
	cited as a source.	0.4	62.00
		-----	-----
	Professional fees thru: 12/31/13	4.2	\$668.50
		-----	-----

Emp	Hours	Rate	Amount
Brian K. Terry, Partner	2.20	170.00	374.00
Kenneth R. Lund, Associate	1.90	155.00	294.50
Brian K. Terry, Partner	0.10	0.00	0.00

Costs advanced	Amount
10/16/13 E101 - Photocopy Charges (2317 copies @ \$0.10)	231.70
11/08/13 E106 - PACER - online research	54.90

Total advanced cost thru 12/31/13	\$286.60

Total current fees and costs 12/31/13	\$955.10

Invoice no	Credits to account	Amount
02/05/14 116139	Payment received from Zurich American Insurance Company (chk# 3332429119)	935.04CR
02/05/14 116139	Write off fees for Zurich American's payment discount.	20.06CR

	Total payments received	\$955.10CR

	TOTAL BALANCE DUE THIS INVOICE:	\$0.00
		=====

THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER

01/23/14

Zurich American Ins. Co.

OUR FILE NUMBER: IFRAH-ELIE/BKT
Invoice No. 116139

Re: IFRAH PLLC, a Professional Limited

NOTE: Please Include Our File No. and/or Invoice No. On Your
Payment.

MAKE CHECKS PAYABLE TO: THORNDAL, ARMSTRONG, DELK,
BALKENBUSH & EISINGER -- OR T.A.D.B.E.

WE NOW ACCEPT MAJOR CREDIT CARDS